

DAVIS POLK & WARDWELL LLP  
450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4000  
Facsimile: (212) 701-5800  
Marshall S. Huebner  
Benjamin S. Kaminetzky  
Darren S. Klein  
James I. McClammy  
Christopher S. Robertson  
Gerard X. McCarthy

*Counsel to the Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., et al.,**

**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**DEBTORS' MOTION FOR LEAVE TO  
EXCEED THE PAGE LIMIT IN FILING OMNIBUS  
REPLY IN OPPOSITION TO THE OBJECTIONS TO  
THE DEBTORS' MOTION TO APPROVE (I) THE ADEQUACY  
OF INFORMATION IN THE DISCLOSURE STATEMENT,  
(II) SOLICITATION AND VOTING PROCEDURES, (III) FORMS OF  
BALLOTS, NOTICES AND NOTICE PROCEDURES IN CONNECTION  
THEREWITH, AND (IV) CERTAIN DATES WITH RESPECT THERETO**

Purdue Pharma L.P. (“PPLP”) and its affiliated debtors in the above-captioned

chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), respectfully

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

represent as follows in support of this motion (“**Motion**”):

1. The *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures*, entered on November 18, 2019 [Dkt. No. 498] (“**Case Management Order**” or “**CMO**”), provides that “replies and statements are limited to 20 pages.” (CMO Ex. 1, ¶ 15.)

2. In response to the Debtors’ *Motion to Approve (I) the Adequacy of Information in the Disclosure Statement, (II) Solicitation and Voting Procedures, (III) Forms of Ballots, Notices and Notice Procedures in Connection Therewith, and (IV) Certain Dates with Respect Thereto* [Dkt. No. 2489] (“**Disclosure Statement Motion**”), 41 objections and supplemental objections, joinders, statements, and letters, including a number of *pro se* letter objections (collectively, “**Objections**”) were filed, consisting of 417 pages of briefing, 242 pages of exhibits, and 56 pages of declarations.

3. For the convenience of the Court and the objecting parties, the Debtors are filing simultaneously herewith an omnibus reply brief in support of the Disclosure Statement Motion (“**Omnibus Reply**”) that responds to 39<sup>2</sup> of the Objections instead of filing as many as 39 separate reply briefs.

4. To effectively respond to the 39 Objections in a single omnibus reply brief and facilitate the orderly presentation of issues to the Court, the Debtors require more than the 20 pages permitted for reply briefs by the Case Management Order. The length of the Debtors’ Omnibus Reply is 39 pages, exclusive of the table of contents and table of authorities. For the convenience of the Court and the parties, the Debtors also have prepared a summary of the

---

<sup>2</sup> The Debtors are contemporaneously filing a separate, single reply brief to the *Joint Objection of the Distributors, Manufacturers, and Pharmacies* [Dkt. No. 2719], and the *Supplement to Johnson & Johnson and Related Entities Joinder to Distributors’, Manufacturers’ and Pharmacies’ Joint Objection* [Dkt. No. 2722], that is within the 20-page limit for replies allowed under the Case Management Order, exclusive of the table of contents, table of authorities, and exhibits. Accordingly, those objections have not been included in the relief requested herein.

Objections and the Debtors' responses thereto, which is 55 pages and attached to the Omnibus Reply as Exhibit A ("Omnibus Objections Response Chart").

5. For the above reasons, the Debtors respectfully request that this Court grant the Debtors leave to file an Omnibus Reply of 94 pages (including the Omnibus Objections Response Chart), exclusive of the table of contents and table of authorities filed simultaneously herewith.

Dated: May 24, 2021  
New York, New York

By: /s/ Darren S. Klein  
DAVIS POLK & WARDWELL LLP  
450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4000  
Facsimile: (212) 701-5800  
Marshall S. Huebner  
Benjamin S. Kaminetzky  
Darren S. Klein  
James I. McClammy  
Christopher S. Robertson  
Gerard X. McCarthy

*Counsel to the Debtors  
and Debtors in Possession*